

FILED  
US DISTRICT COURT  
DISTRICT OF ALASKA

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IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF ALASKA

UNITED STATES OF AMERICA,	)	Case No. A05-089 CR (RRB)
	)	
Plaintiff,	)	
	)	
vs.	)	<u>JOINT MOTION TO</u>
	)	<u>CONTINUE TRIAL DATE</u>
ROBERT W. LERVAAG and	)	
RONALD H. FRAZE,	)	
	)	
Defendants.	)	
	)	
	)	

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COME NOW the parties, by and through undersigned counsel for the government, and jointly move this court for a continuance of the trial date in the above captioned case. The parties previously met with the assigned magistrate judge and detailed the discovery issues and the need for a new trial date to

accommodate the time necessary to obtain and review extensive discovery. The magistrate judge has set a discovery and motions schedule, at the parties' behest, that would be outside the currently set trial date.

The parties further agree that this case is complex under 18 U.S.C. § 3161(h)(8)(B)(ii) in that it involves factual matters that have been addressed in a series of civil proceedings that took place over a number of years and numerous documents involving bank loans and accounting practices. The parties have also previously discussed a proposed trial date sometime in May of 2006.

For the above reasons, the parties respectfully request that this court consider their joint request for a continuance of the trial date in this matter.

DATED this 14<sup>th</sup> day of December 2005, Anchorage, Alaska.

TIMOTHY M. BURGESS  
United States Attorney



KAREN LOEFFLER  
Assistant U.S. Attorney

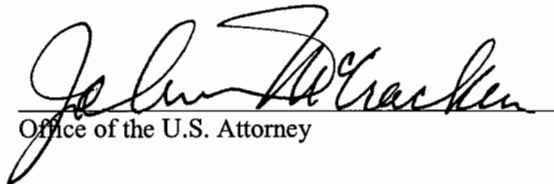
I declare under penalty of perjury that a true and correct copy of the foregoing was sent to the following counsel of record on December 14, 2005, via:

Sue Ellen Tatter  
Federal Defender's Office Mail Drop

( ) Facsimile Transmission  
(X) U.S. Mail

Ronald Offret  
Federal Public Defender's Office  
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Executed at Anchorage, Alaska, on December 14, 2005

  
Office of the U.S. Attorney